

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x Chapter 11  
-----  
In re : Case No.01-13591  
H.C. ENTERTAINMENT CORP., : Adv. Proceeding No. \_\_\_\_\_  
Debtor. :  
----- x  
-----  
WATERFRONT N.Y., L.P., :  
Plaintiff, :  
-against- **COMPLAINT**  
H.C. ENTERTAINMENT CORP, :  
Defendant. :  
-----x

Plaintiff, Waterfront N.Y., L.P. ("Plaintiff"), by and through its attorneys, LeBoeuf, Lamb, Greene & MacRae, L.L.P., as and for its Complaint (1) for an Order compelling H.C. Entertainment Corp., the debtor and debtor-in-possession herein (the "Defendant" or "Debtor"), to provide adequate proof of insurance coverage, or, if it is unable to do so, (2) for an Order compelling Defendant to cease all operation of its nightclub, known as the Tunnel, which it operates at the premises owned and leased from Plaintiff, respectfully alleges as follows:

1. Plaintiff repeats, realleges and incorporates by reference all of the allegations

contained in the Motion Of Waterfront N.Y., L.P. For An Order Pursuant To Bankruptcy Code Section 105(a) Compelling Debtor To (1) Provide Adequate Proof Of Insurance Coverage Or (2) Cease Operations, dated July 20, 2001, submitted in this case to the Hon. Robert E. Gerber, a copy of which is annexed hereto as Exhibit "A".

**WHEREFORE**, Plaintiff respectfully requests that the Court (1) compel the Defendant to provide adequate proof of insurance coverage, and, if the Defendant is unable to do so, (2) enter an order compelling the Defendant to cease operation of the Tunnel nightclub, subject to further order of the Court and (3) grant such other and further relief as the Court deems just and proper.

Dated: New York, New York  
August 8, 2001

**LeBoeuf, LAMB, GREENE & MacRAE  
L.L.P.**

By: s/Jay G. Safer  
John P. Campo (JC-5241)  
Jay G. Safer (JS-4609)  
125 West 55th Street  
New York, New York 10019  
(212) 424-8000

Counsel for Waterfront N.Y., L.P.

388725